

(AR-18J)

July 30, 2003

Donald Sutton
Illinois Environmental Protection Agency
Division of Air Pollution Control
P.O. Box 19506
Springfield, Illinois 62794-9506

Dear Mr. Sutton:

This letter is in reply to your letter dated April 26, 2002, requesting guidance on the applicability of Federal rules for Prevention of Significant Deterioration (PSD), Title 40 Code of Federal Regulations (C.F.R.) Part 52.21, with regard to PPG Industries (PPG) flat glass manufacturing facility in Mount Zion, Illinois (facility ID 115810AAA). Specifically, PPG requested guidance on whether replacing the refractory brick (rebricking) of Line No. 1 constitutes a major modification subject to the PSD requirements.

On August 20, 2002, the United States Environmental Protection Agency (USEPA) requested additional information necessary to make an applicability determination from Illinois Environmental Protection Agency. On October 8, 2002, and January 7, 2003, PPG Industries submitted additional information to USEPA addressing the questions we raised during our review.

Based on the information made available to us, and as explained below, USEPA has determined that the planned project is not subject to the PSD. As you know, any major modification at an existing facility must meet the requirements of PSD. 40 C.F.R. § 52.21(a)(2)(i). A major modification is defined as any physical change or change in the method of operation that results in a significant net emissions increase from the source. 40 C.F.R. § 52.21(b)(2)(1).

According to the information provided by PPG, the rebricking is not projected to result in an emissions increase, either in annual or short-term emissions; and, therefore, is not subject to PSD. No emissions increase is projected

because PPG has represented that the rebricking: (1) will not recover lost utilization of the glass furnace; and (2) will not change the glass melting area or the footprint of the furnace.

Therefore, because the rebricking project is not projected to result in any increase in emissions, it is USEPA's determination that the planned project currently is not subject to PSD. If you have any further questions, please feel free to contact Constantine Blathras, of my staff, at (312) 886-0671.

Sincerely yours,

/s/

Pamela Blakely, Chief
Permits and Grants Section